

IN THE UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT
No. 14-4322

UNITED STATES OF AMERICA)
)
)
v.)
)
)
ERNEST JOSHON WRIGHT,)
Appellant.)

MOTION TO WITHDRAW

NOW COMES Jacob P. Warner, counsel of record for the Appellant, Ernest Joshon Wright (hereinafter “Appellant”), and hereby moves to withdraw as Counsel representing Appellant pursuant to Local Rule 46(c) of the United States Court of Appeals for the Fourth Circuit. In support thereof, the undersigned shows unto the Court as follows:

1. The undersigned is currently counsel of record, having been appointed to represent the Appellant in the District Court and subsequently by the Court of Appeals.
2. On April 8, 2014, the undersigned counsel filed the Notice of Appeal to this Court at the Appellant’s instruction.
3. Prior to filing of the Notice of Appeal, the undersigned met with Appellant concerning an appeal. Appellant and the undersigned agreed that it would be in the best interests of Appellant for another attorney to represent him on appeal. There may also be a conflict of interest for the undersigned counsel in continuing to represent the Appellant on appeal.
4. The undersigned counsel informed Appellant at that time that he would file the Notice of Appeal as directed, but would then also move to withdraw from further representation of Appellant.
5. The undersigned counsel is this day sending a copy of this Motion to the Appellant, and is thus informing him of his right to respond to this Motion within seven (7) days.

6. Good cause exists for granting this Motion.

WHEREFORE, undersigned counsel respectfully prays that this Court enter an Order allowing him to withdraw as counsel of record for Appellant and appoint him new counsel.

Respectfully submitted this the 23rd day of April, 2014.

PERRY, PERRY, & PERRY
Attorneys for the Defendant

By: /s/ Jacob P. Warner
Jacob P. Warner
P.O. Drawer 1475
Kinston, NC 28503-1475
Tel.: (252) 523-5107
Fax: (252) 523-8858
Email: jake@perryattorneys.com
NC Bar No. 43283

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing NOTICE OF APPEAL was served upon:

William Glenn Perry
U. S. Attorney's Office
215 South Evans Street, Suite 206
Greenville, NC 27858
919-645-5303
Fax: 252-830-1132
Email: glenn.perry@usdoj.gov

by electronically filing the foregoing with the Clerk of Court on April 23, 2014, using the CM/ECF system which will send notification of such filing to the above.

In addition, undersigned counsel mailed the foregoing Motion to Withdraw via U.S. Mail, First Class to:

Ernest Joshon Wright, No. 56920-056
Oklahoma City FTC
7410 S. MacArthur Blvd.
Oklahoma City, OK 73169

This 23rd day of April, 2014.

PERRY, PERRY, & PERRY
Attorneys for the Defendant

By: /s/ Jacob P. Warner
Jacob P. Warner
P.O. Drawer 1475
Kinston, NC 28503-1475
Tel.: (252) 523-5107
Fax: (252) 523-8858
Email: jake@perryattorneys.com
NC Bar No. 43283